Data Protection Statement

How is my personal information used?

This data protection statement tells you how Royal London will use your personal information when you apply for a Post Office policy provided by Royal London. Where we refer to ‘we’, ‘us’ and ‘our’ we are referring to Royal London. For details on how Post Office use your personal information please see ‘Post Office Privacy Policy’ section on page 2 and for further details, please refer to the Post Office Privacy Policy at www.postoffice.co.uk/privacy
Both Post Office and Royal London will collect, or facilitate the collection of, your personal information which they will then share with one another. Royal London will also share with the Post Office the personal information which it receives and holds about you. The personal information may include sensitive personal information, such as your medical information, that you submit as part of the application process or any claims.

This section is a notice which we are required to give you under the data protection laws. It tells you how Royal London will use your personal information. We may update this notice from time to time and we will alert you to any important updates. It is not meant to be a legal contract between you and Royal London, and this does not affect your rights under the data protection laws.

In this notice we have included the uses that we feel would be most important to you on how we will use your personal information.

We use your information for the following:

- Arranging, providing, administering your policy and managing any queries or claims;
- Assessing medical and lifestyle information – we only do this when it is necessary to set up your policy or consider your claim for ill health;
- Verifying your identity and carrying out fraud prevention checks. We will use a reputable reference agency who will access a range of data such as information from the electoral register. Although we will keep a record of this search, we will not share it outside the Royal London Group;
- To ensure we meet our legal and regulatory responsibilities.
- If we lose touch we will use a trusted 3rd party to find you and reunite you with your policy, where we can.

We also use your information for other activities. Where we do this we require a ‘legitimate interest’. This is when each activity is assessed and your rights and freedoms are taken into account ensuring that nothing we do is too intrusive or beyond your reasonable expectation.

We use legitimate interests for:

- Market research – We use personal information to help us understand that our products and services suit the needs of our customers and meet your expectations. We also do this to improve your customer experience;
- Analytics and Insight – We generally combine your information with other customers’ in order to check if our products are priced fairly and are suitable for our customers. We also do this to check that our communications are easy to understand;
- Marketing and Communications – To send you information about your products and other products you may be interested in;
- We use a trusted 3rd party to help us to provide you with communications relevant to you, and reduce the chances of you receiving information you wouldn’t want. There is more information on marketing and communications in our full Privacy Notice on our website.

We may monitor and record phone calls, such as when managing queries and claims for training and quality purposes. We do this so we have accurate records of what you tell us to do.

Providing information about someone else

If you provide information to us about someone else, you must have their permission to do so, and have told them about how we will use their personal information.

How long will you hold my personal information?

We’ll keep your personal information for as long as is needed, for the purpose for which it was collected, and to comply with our legal and regulatory responsibilities. This will involve keeping your information for a reasonable period of time after your policy or your relationship with us has ended.

If there aren’t any legal, regulatory or contractual requirements, any other personal information is kept for seven years from the date your policy ended.
How will my personal information be shared?

Your information will be used by employees of Royal London, who need to see or work on your policy. In addition to our own staff we share your information with other companies so that we can administer your policy and provide our services to you. Such as:

- Other companies within the Royal London Group;
- Our service providers and agents e.g. who print your annual statement, our data storage providers, who send an email on our behalf following a quote;
- Approved IT specialists e.g. those who support our IT systems;
- Our third party advisers, such as auditors, underwriters, reinsurers, medical agencies and legal advisers;
- Identity authentication and fraud prevention agencies; and/or
- Legal and regulatory bodies.

How will my personal information be protected?

We will protect your personal information with the right level of security. Depending on the policy you have with us, some of your personal data might be processed overseas outside of the European Economic Area (EEA). We take the steps needed to make sure that your information is treated securely and has the right legal protection.

How can I find out more?

You can find out more information about how we handle your personal information by visiting our Privacy Notice at www.royallondon.com/legal/privacy/

Our full Privacy Notice contains more detail on:

(i) Our legal grounds for using your personal information (including more information about our legitimate interests and our approach to sending marketing communications);
(ii) How your personal information is protected if we transfer it overseas;
(iii) How we protect your personal information;
(iv) How long we keep your personal information for; and
(v) Your rights under the data protection laws and how to exercise them (including how to object to marketing we send to you and to processing done under legitimate interests).

Marketing

Royal London will not send you any information about other Royal London products, unless you have agreed to receiving these communications. This could be because you have indicated consent to receiving such information as part of being a Royal London customer or applying for another Royal London product or service.

You have a right to object to marketing from Royal London if you are already a Royal London customer or have applied to us directly for a service. If you would like to do this or change how you’d like to receive marketing, please contact us on 0345 600 7788 or by email at GDPR@royallondon.com

What are my rights?

If you are not able to access the full Privacy Notice at www.royallondon.com/legal/privacy/ or you would prefer a recorded version you can call 0800 085 8352. If you prefer to receive the full Privacy Notice in another format, please also use this telephone number, or contact us at the email or postal address below.

If you wish to use any of your rights under the data protection laws, please contact us. For example, you might want to access a copy of your information, or to correct any inaccurate information. You should contact our Data Protection Officer

Email: GDPR@royallondon.com

or

Royal London
Royal London House
Alderley Road
Wilmslow
Cheshire
SK9 1PF

Post Office Privacy Policy

At the Post Office we’re committed to protecting your personal information and respecting your privacy in everything we do. This summarised Policy lets you know what data we collect about you, how we use it and gives you information about your rights and how you can get in touch with us.

For more detail, please go to www.postoffice.co.uk/privacy

We are

- Post Office Management Services Limited is registered in England and Wales. Registered Number 08459718. Registered Office: Finsbury Dials, 20 Finsbury Street, London, EC2Y 9AQ

We have a Data Protection Officer who can be contacted at the address above or by sending an email to data.protection@postoffice.co.uk

We collect

Name, address, contact details, date of birth, marketing preferences and other information you give us in order to apply for the product which may include health conditions. Additional data including opinions may be collected through your correspondence with us. To provide you with other products and services that you may be interested in our data is enriched with other information from other sources.

Why we collect personal information about you and what we do with it

We use your data to provide the product or service, to comply with law, where we have your agreement or consent, where a reasonable justification exists and for substantial public interest for medical conditions.
We use your information:

- To arrange your insurance policy.
- To provide information about exciting offers and deals. We only contact you in the ways you have given us permission for. You can change your mind at any time – see ‘Your Rights and Choices’.
- To enhance or improve your experience with us. Our communications about offers are tailored specifically based on your preferences and habits (‘profiling’).
- In combination with other customers’ data, including anonymised external information to better understand our markets. This analysis and segmentation ensures we offer competitive products and services (‘profiling’).
- For internal business processes like transacting with partners, conducting audits, producing management information, managing complaints, to assist in training, quality assurance and compliance.
- For customer feedback surveys, to prevent fraud and to comply with anti-money laundering regulations.
- To manage your rights under the UK Data Protection Act including managing marketing suppression lists.
- For obligations imposed by law enforcement agencies and other organisations.

Who we share your information with

We never sell your information and only pass it to our trusted partners and service providers. Royal London Mutual Insurance Society Limited provide our Life insurance products and you should read their Privacy Policy at http://www.royallondon.com/legal/privacy If you choose to use Post Office Money Helping Hand, your personal data will be shared with RedArc so that they can provide their service to you.

Transferring information outside of the EEA

Your personal information may be processed outside the European Economic Area (EEA) where privacy laws may not provide protection to the same level as in the UK. Before any transfer takes place, steps are taken to ensure your personal information is adequately protected and safeguards such as standard contractual clauses are in place.

How long do we keep your personal information?

Your personal information is removed after its purpose has been served and after either party can make a legal claim, or where required for legal or regulatory reasons.

Your Rights and Choices

You can object to Direct Marketing by calling 03457 22 33 44, text phone 03457 22 33 45, sending an email to pol_marketpermissions@response-services.co.uk or by writing to:

Marketing Preference Team
Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

You can request a copy of all personal information held about you by contacting our Information Rights Team.

You have the right to lodge a complaint with the Information Commissioner’s Office. See https://ico.org.uk/

You have qualified rights to withdraw consent, have information about you corrected, deleted, provided to you (‘portability’) and the right to object to or to restrict processing of your data. You may request human intervention where automated processing has taken place.

Contact Us

For information about our privacy practices and to exercise any of these rights then please contact our Information Rights Team by writing to:

Post Office Information Rights Team
Finsbury Dials
20 Finsbury Street
London EC2Y 9AQ

Email: information.rights@postoffice.co.uk